

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GORDON FOOD SERVICE, INC., and
GLAZIER FOODS COMPANY,

Plaintiffs,

vs.

TYSON FOODS, INC.; TYSON CHICKEN,
INC.; TYSON BREEDERS, INC.; TYSON
POULTRY, INC.; KOCH FOODS, INC.; JCG
FOODS OF ALABAMA, LLC; JCG FOODS
OF GEORGIA, LLC; KOCH MEAT CO.,
INC.; SANDERSON FARMS, INC.;
SANDERSON FARMS, INC. (FOOD
DIVISION); SANDERSON FARMS, INC.
(PRODUCTION DIVISION); SANDERSON
FARMS, INC. (PROCESSING DIVISION);
HOUSE OF RAEFORD FARMS, INC.; MAR-
JAC POULTRY, INC.; PERDUE FARMS,
INC.; PERDUE FOODS, LLC; WAYNE
FARMS, LLC; SIMMONS FOODS, INC.;
SIMMONS PREPARED FOODS, INC.; O.K.
FOODS, INC.; O.K. FARMS, INC.; O.K.
INDUSTRIES, INC.; HARRISON POULTRY,
INC.; FOSTER FARMS, LLC; FOSTER
POULTRY FARMS; NORMAN W. FRIES,
INC. d/b/a CLAXTON POULTRY FARMS,
INC.; MOUNTAIRE FARMS, INC.;
MOUNTAIRE FARMS, LLC; MOUNTAIRE
FARMS OF DELAWARE, INC.; CASE
FOODS, INC.; CASE FARMS, LLC; CASE
FARMS PROCESSING, INC.; and AGRI
STATS, INC.,

Defendants.

Case No.:

COMPLAINT

Jury Trial Demanded

COMPLAINT

1. Plaintiffs Gordon Food Service, Inc. and Glazier Foods Company (together, “GFS” or “Plaintiffs”) bring this action under the federal antitrust laws against the Defendants identified below and incorporate by reference the factual allegations and reservations of rights contained in the Direct Action Plaintiffs’ Amended Consolidated Complaint and Demand for Jury Trial, filed in *In re Broiler Antitrust Litigation*, Civil Action No. 1:16-cv-08637 (ECF 4243; ECF 4244).

2. Gordon Food Service, Inc. is a Michigan corporation with its principal place of business in Wyoming, Michigan. Gordon Food Service, Inc. is the largest family-operated broadline food distribution company in North America. Glazier Foods Company is a Texas corporation with its principal place of business in Houston, Texas, which was acquired by Gordon Food Service, Inc. in 2014. Glazier Foods Company is a leading foodservice provider and one of the largest full-line independent food distributors in the United States.

3. GFS joins Section II of the Direct Action Plaintiffs’ Amended Consolidated Complaint and Demand for Jury Trial, adding the following to specify the GFS causes of action and the Defendants in the GFS action.

Plaintiff Name	Named Defendants¹	Named Co-Conspirators	Causes of Action
Gordon Food Service, Inc. and Glazier Foods Company	Agri Stats; Claxton; Foster Farms; Harrison; House of Raeford; Koch; Mar-Jac; Mountaire; O.K. Foods; Perdue; Sanderson; Simmons; Tyson; Wayne; Case	Fieldale; Amick; George's; Peco; Keystone; Pilgrim's Pride; Allen Harim	Count I (Sherman Act Claim for all Anticompetitive Conduct); Count II (Sherman Act Claim for Output Restriction, Pled in the Alternative to Count I); Count III (Sherman Act Claim for GA Dock Manipulation, Pled in the Alternative to Count I)

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. Enter joint and several judgments against all Defendants in favor of Plaintiffs;
- B. Award Plaintiffs treble damages, of an amount to be determined at trial, to the maximum extent allowed under the federal antitrust laws;
- C. Award Plaintiffs post-judgment interest as provided by law, with such interest to be awarded at the highest legal rate;
- D. Award Plaintiffs their attorneys' fees, litigation expenses, and costs, as provided by law;
- E. Grant Plaintiffs such other and further relief to which Plaintiffs are entitled.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Plaintiffs demand a trial by jury on all of their claims and issues so triable.

¹ The Defendants named in this Complaint include the entire Defendant family of each Defendant in this table, identified in Section IV.B of ECF 4243/ECF 4244.

Dated: August 25, 2021

Respectfully submitted,

/s/ Terence H. Campbell

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